

# MEMO ENDORSED

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January 13, 2022

**Via ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
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**RE: United States v. Michael Lillo  
Criminal Docket 20 CR 536 (VEC)**

Dear Judge Caproni:

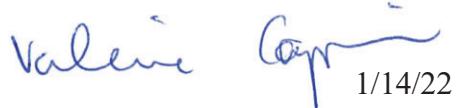
As your Honor is aware we have a scheduled status conference on Tuesday the 18th. Currently MDC is on Covid lockdown and I am unable to meet with Mr. Lillo to review discovery. I was able to meet prior to the lockdown to review some of the discovery, however a full review with Mr. Lillo is still outstanding. The government provided a hard drive for Mr. Lillo's review that was delivered to the facility today. Mr. Lillo is also on lockdown most of the day and his ability to review the discovery at the law library is limited. I am requesting that our scheduled status conference on the 18th be adjourned to February 2nd or any day that week. If it so pleases the Court my client would like to proceed at the next appearance virtually as opposed to in-person. I corresponded with the Government and they have no objections to this request.

Thank you for your time and consideration in this matter.

Respectfully,  
*Kenneth J. Montgomery*  
Attorney for Michael Lillo  
198 Rogers Avenue  
Brooklyn, New York 11225

The conference currently scheduled for January 18, 2022, at 3:30 p.m. is hereby ADJOURNED *sine die*. Defense counsel is directed to submit a status update by not later than February 15, 2022 indicating whether Mr. Lillo is prepared to move forward with his sentencing or intends to move to withdraw his guilty plea.

SO ORDERED.

  
1/14/22

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE